

Ashton Zylstra

From: Cary Hansel
Sent: Monday, December 23, 2019 5:19 PM
To: John Fredrickson -DGS-
Cc: Robert McFarland -DGS-; Ashton Zylstra
Subject: RE: Hulbert

What "Executive/Deliberative Process" privilege are you citing? Can you provide any citations to support such a privilege?

I would like to meet in person to discuss these issues prior to filing a motion to compel. Please provide dates and times.

Best regards,

Cary

CARY J. HANSEL
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2514 NORTH CHARLES STREET
BALTIMORE, MARYLAND 21218
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-----Original Message-----

From: John Fredrickson -DGS- [mailto:john.fredrickson@maryland.gov]
Sent: Monday, December 23, 2019 5:10 PM
To: Cary Hansel <Cary@hansellaw.com>
Cc: Robert McFarland -DGS- <robert.mcfarland@maryland.gov>
Subject: Re: Hulbert

Cary: I was counting on 12/24 as a work day, so I am trying to get you as much as possible today.
Attached please find:

1. Privilege log for NC 01-81

2. NC 01 -81 produced as redacted. If the entire page was redacted it is not included.

As for the Executive Protection officers who were likely on the Lt. Gov's detail on 2/5/18 (Sgt. Shusko and Tfc. Walder), I have been unable to confirm which was on duty. The assignment/post records are only retained for 6 months.

I plan to forward additions to Col. Wilson's responses to RFPs tomorrow.

I hope you and your family have a wonderful holiday.

John C. Fredrickson Assistant Attorney General Maryland Department of General Services
300 W. Preston Street, Room 608
Baltimore, Maryland 21201
Telephone Number: (410) 767-1825

On Mon, Dec 23, 2019 at 2:10 PM Cary Hansel <Cary@hansellaw.com> wrote:

>
> John, given that State offices are closed tomorrow, should we expect these items today?

>
> Thanks,

>
> Cary

>
> -----Original Message-----

> From: Cary Hansel
> Sent: Wednesday, December 18, 2019 2:19 PM
> To: John Fredrickson -DGS- <john.fredrickson@maryland.gov>
> Subject: RE: Hulbert

>
> I'll look forward to your substantive responses on or before Dec. 24th in that case. Please also provide deposition dates at that time.

>
> Best regards,

>
> Cary

>
> CARY J. HANSEL
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> -----Original Message-----

> From: John Fredrickson -DGS- [mailto:john.fredrickson@maryland.gov]

> Sent: Wednesday, December 18, 2019 2:13 PM

> To: Cary Hansel <Cary@hansellaw.com>

> Subject: Re: Hulbert

>

> Cary: Thank you for email. My notes indicate that we set a target time frame of two weeks from 12/10 in order to: 1) consider revisions to RFA responses, 2) Confirm which MSP officer was on detail with the Lt. Gov., and 3) Produce the emails that the Executive indicated would be redacted based on privilege. I believe we will have these items within the time frame we discussed, or before.

>

> Best,

>

>

> John C. Fredrickson

> Assistant Attorney General

> Maryland Department of General Services

> 300 W. Preston Street, Room 608

> Baltimore, Maryland 21201

> Telephone Number: (410) 767-1825

>

>

>

> On Tue, Dec 17, 2019 at 11:00 AM Cary Hansel <Cary@hansellaw.com> wrote:

>>

>> Gentlemen, when we met and conferred regarding discovery after the last deposition, you promised to identify the officer with the Lt. Governor who called the mansion and to make him available for deposition.

>>

>> Who is he and when is he available?

>>

>> You also both promised to update requests for admission. I have Bob's proposed updates, but nothing from John.

>>

>> You also promised to provide the various scheduling documents identified in the deposition. They have not been provided. When can we expect them?

>>

>> Finally, you promised, once again, to provide the emails responsive to our outstanding subpoena. They are months overdue. When can we expect them?

>>

>> Thanks,

>>

>> Cary